SITKA GOLD CORP.
(the "**Company**")

INSIDER TRADING & BLACKOUT POLICY

PURPOSE

Directors, officers, members of management, and such other persons as may be designated by the Company from time to time ("**Insiders**") of the Company are from time to time in possession of Undisclosed Material Information. This Policy is designed to ensure that (i) Insiders understand their obligations to preserve the confidentiality of Undisclosed Material Information; and (ii) that all appropriate parties who have Undisclosed Material Information understand that they are prohibited from trading in the Company's securities or tipping under securities laws, stock exchange rules and this Policy.

In this Policy, "**Undisclosed Material Information**" means:

a) a change in the business, operations or capital of the Company that would reasonably be expected to have a significant effect on the market price or value of the securities of the Company (which includes any decision to implement such a change by the board of directors of the Company (the "**Board**") or by senior management who believe that confirmation of the decision by the Board is probable); or

b) a fact that significantly affects, or would reasonably be expected to have a significant effect on, the market price or value of the securities of the Company;

in each case, that has not been generally disclosed in a widely disseminated news release, or that has been publicly disclosed but a reasonable period of time for its dissemination has not passed.

In assessing whether information may constitute Undisclosed Material Information, Insiders should consider whether the information would reasonably be expected to influence a reasonable investor's decision to buy, sell or hold securities of the Company. Insiders who are uncertain whether information is material should treat it as Undisclosed Material Information and consult the Information Officer(s) (see below) before trading in securities of the Company or disclosing the information.

GENERAL PROHIBITIONS

No Insider may trade in the securities of the Company when he or she is aware of Undisclosed Material Information until the information is publicly disclosed and a reasonable period of time for its dissemination has passed. Generally, a reasonable period of time will be one trading day; however, it may be longer depending on the market following of the Company. An Information Officer (as defined below) should be consulted to determine what would be a reasonable period of time in the circumstances.

In addition, Insiders with knowledge of Undisclosed Material Information are prohibited from tipping, recommending or encouraging another person to trade securities of the Company.

These prohibitions extend to other issuer's securities whose price or value may reasonably be expected to be affected by changes in the price of the Company's securities and includes the granting or exercise of Company stock options or other convertible securities.

INFORMATION OFFICERS

For purposes of this Policy, Cor Coe, Director and Chief Executive Officer of the Company (primary), and Stephen Pearce, the Chief Financial Officer (backup), have been designated as the "**Information Officers**" and can be contacted at ccoe@sitkagoldcorp.com and spearce@sitkagoldcorp.com (respectively).

UNDISCLOSED MATERIAL INFORMATION OF OTHER COMPANIES

Where Insiders become aware of Undisclosed Material Information concerning another public company, they may not trade the securities of that company until the information is publicly disclosed and a reasonable period of time for its dissemination has passed.

POST-TERMINATION OBLIGATIONS

This Policy continues to apply to any Insider following the termination of such person's service or employment with the Company until Undisclosed Material Information known to such person at the time of termination has been publicly disclosed or is no longer material.

BLACKOUT PERIODS

The Information Officers, in consultation with senior management, may prescribe trading blackouts (each, a "**Blackout Period**") from time to time. A Blackout Period generally prohibits trading in the Company's securities before Undisclosed Material Information is made public, and for a specific period of time thereafter. Management will consider, among other things, pending transactions and other Material Information to determine when to prohibit trading. During Blackout Periods, the Company must also avoid discussions with analysts, private briefings and interviews to the maximum extent reasonable. An appropriate response (not involving disclosure of Undisclosed Material Information) should be developed ahead of meetings that cannot be avoided to handle questions about such information that is the subject of the blackout.

The Information Officers, in consultation with senior management, will be responsible for setting the length of Blackout Periods and notifying Insiders and other applicable individuals with access to Undisclosed Material Information of Blackout Periods in effect.

For example, a Blackout Period may commence when the Company is involved in sensitive negotiations in connection with matters such as financings, acquisitions or divestitures of a material nature, or the release of significant exploration results.

The fact that a Blackout Period has been imposed must be kept strictly confidential.

Notwithstanding the foregoing, an Insider may purchase or sell securities during a Blackout Period with the prior written consent of the appropriate Information Officer. The Information Officer will

grant permission to purchase or sell during a Blackout Period only in the case of unusual, exceptional circumstances, and, for greater certainty, only if the Insider is not, at that time, aware of any Undisclosed Material Information. Without limiting the generality of the foregoing provisions of this paragraph, "unusual, exceptional circumstances" may include the sale of securities in the case of severe financial hardship or where the timing of the sale is critical for significant tax planning purposes.

REPORTING INSIDERS

"Reporting insiders" of the Company, as defined in National Instrument 55-104 - *Insider Reporting Requirements and Exemptions*, are required to file insider reports on SEDI in accordance with National Instrument 55-104.

CONSEQUENCES OF VIOLATIONS

A violation of this Policy would cause embarrassment and other harm to the Company. As a result, the Company may take its own disciplinary actions, which could result in termination of employment or implementation of a probationary period. In addition, violations of insider trading laws may result in significant penalties, including fines, civil liability and imprisonment. If the Company becomes aware of a potential violation of applicable securities laws, the matter may be referred to the appropriate regulatory authorities. The Company is also entitled to pursue legal remedies through the courts, as applicable.

POLICY REVIEW AND OVERSIGHT

The Board will review this Policy as required from time to time to ensure that it is achieving its purpose. Based on the results of the review, the Policy may be revised accordingly. The Chairman of the Board shall be responsible for initiating the review.

The Chief Executive Officer, subject to the approval of the directors of the Company, shall have overall responsibility for developing and implementing this Policy, monitoring the effectiveness of and compliance with this Policy and educating the Company’s directors, officers and employees about this Policy.

PUBLICATION OF THE POLICY ON THE COMPANY’S WEBSITE

This Policy will be posted on the Company’s website at https://sitkagoldcorp.com.

The Policy was approved by the Board on August 10, 2026.